



HAGENS BERMAN

Jason A. Zweig  
 Partner  
**HAGENS BERMAN SOBOL SHAPIRO LLP**  
 555 FIFTH AVENUE, SUITE 1700  
 NEW YORK, NY 10017  
[www.hbsslaw.com](http://www.hbsslaw.com)  
**Direct (708) 628-4958**  
[jasonz@hbsslaw.com](mailto:jasonz@hbsslaw.com)

June 22, 2018

**BY ECF**

Honorable Naomi Reice Buchwald, U.S.D.J.  
 United States District Court  
 for the Southern District of New York  
 Daniel Patrick Moynihan  
 United States Courthouse  
 500 Pearl Street  
 New York, New York 10007-1312

**Re:** *In re: LIBOR-Based Financial Instruments  
 Antitrust Litig.,  
 Civil Action No. 11-md-2262 (NRB)*

*33-35 Green Pond Associates, LLC v.  
 Bank of America Corp., et al.,  
 Civil Action No. 12-cv-5822 (NRB)*

*Courtyard at Amwell II, LLC, et al. v.  
 Bank of America Corp., et al.,  
 Civil Action No. 12-cv-6693 (NRB)*

Dear Judge Buchwald:

My firm, along with others, represents plaintiffs 33-35 Green Pond Road Associates, LLC and Courtyard at Amwell II, LLC, Greenwich Commons II, LLC, Jill Court Associates II, LLC, Maidencreek Ventures II LP, Raritan Commons, LLC, and Lawrence W. Gardner (collectively, the *Green Pond Plaintiffs*).

Pursuant to paragraph 22 of the May 11, 2016 Amended Stipulation and Protective Order (ECF No. 1405) (*Protective Order*), counsel for the parties in the Green Pond Plaintiffs' cases file the enclosed Acknowledgments, acknowledging the terms of, and agreeing to be bound by, the Protective Order. Paragraph 22 of the Protective Order also requires these acknowledgments to be filed with the Court.

We thank this Court for its kind and continued attention to this matter.

Letter to the Honorable Naomi Reice Buchwald

June 22, 2018

Page 2

Respectfully submitted,

Jason A. Zweig

JAZ:jz

cc: All counsel by ECF

ACKNOWLEDGEMENT

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

IN RE LIBOR-BASED FINANCIAL  
INSTRUMENTS ANTITRUST  
LITIGATION

THIS DOCUMENT RELATES TO ALL  
ACTIONS.

MDL No. 2262

ECF Case

Master File No. 1: 11-md-2262-NRB

ACKNOWLEDGMENT AND AGREEMENT TO BE BOUND BY  
STIPULATION AND ORDER OF CONFIDENTIALITY

I, Jason Zweig, counsel to plaintiffs Courtyard at Amwell II, LLC, Greenwich Commons II, LLC, Jill Court Associates II, LLC, Maidencreek Ventures II LP, Raritan Commons, LLC, and Lawrence W. Gardner in *Courtyard at Amwell II, LLC et al. v. Bank of America Corp., et al.*, Civil Action No. 12-CV-6693 (S.D.N.Y.)(NRB), under penalty of perjury, 28 U.S.C. §1746, declare as follows:

1. Information, including documents and things, designated as "CONFIDENTIAL" or "HIGHLY CONFIDENTIAL" as defined in the Stipulation and Order of Confidentiality entered in the above-captioned Actions (the "Stipulation and Order"), is being provided to me pursuant to the restrictions of the Stipulation and Order.
2. I have been given a copy of and have read the Stipulation and Order.
3. I am familiar with the terms of the Stipulation and Order, and I agree to comply with and to be bound by its terms.

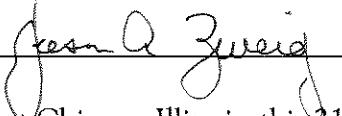
4. I submit to the jurisdiction of the United States District Court for the Southern District of New York for enforcement of the Stipulation and Order.

5. I acknowledge that violation of the Stipulation and Order may result in penalties for contempt of court.

6. I agree to not use any Confidential or Highly Confidential Discovery Materials disclosed to me pursuant to the Stipulation and Order except for purposes of the above-captioned litigation and not to disclose any of this information to persons other than those specifically authorized by the Stipulation and Order, without the express written consent of the party who designated the information as confidential or by order of the presiding judge.

7. I agree to notify any stenographic, clerical, or technical personnel who are required to assist me of the terms of this Stipulation and Order and of its binding effect on them and me.

Name: Jason A. Zweig

Signature: 

Signed at Chicago, Illinois, this 21st day of June, 2018

## ACKNOWLEDGEMENT

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

IN RE LIBOR-BASED FINANCIAL  
INSTRUMENTS ANTITRUST  
LITIGATION

THIS DOCUMENT RELATES TO ALL  
ACTIONS.

MDL No. 2262

ECF Case

Master File No. 1: 11-md-2262-NRB

### ACKNOWLEDGMENT AND AGREEMENT TO BE BOUND BY STIPULATION AND ORDER OF CONFIDENTIALITY

I, Vincent J. Esades, counsel to plaintiff 33-35 Green Pond Road Associates, LLC, 33-35 *Green Pond Associates, LLC v. Bank of America Corp., et al.*, Civil Action No. 12-cv-5822 (S.D.N.Y.)(NRB), under penalty of perjury, 28 U.S.C. §1746, declare as follows:

1. Information, including documents and things, designated as "CONFIDENTIAL" or "HIGHLY CONFIDENTIAL" as defined in the Stipulation and Order of Confidentiality entered in the above-captioned Actions (the "Stipulation and Order"), is being provided to me pursuant to the restrictions of the Stipulation and Order.
2. I have been given a copy of and have read the Stipulation and Order.
3. I am familiar with the terms of the Stipulation and Order, and I agree to comply with and to be bound by its terms.
4. I submit to the jurisdiction of the United States District Court for the Southern District of New York for enforcement of the Stipulation and Order.

5. I acknowledge that violation of the Stipulation and Order may result in penalties for contempt of court.

6. I agree to not use any Confidential or Highly Confidential Discovery Materials disclosed to me pursuant to the Stipulation and Order except for purposes of the above-captioned litigation and not to disclose any of this information to persons other than those specifically authorized by the Stipulation and Order, without the express written consent of the party who designated the information as confidential or by order of the presiding judge.

7. I agree to notify any stenographic, clerical, or technical personnel who are required to assist me of the terms of this Stipulation and Order and of its binding effect on them and me.

Name: Vincent J. Esades

Signature: 

Signed at Minneapolis, Minnesota, this 21st day of June, 2018

## **ACKNOWLEDGMENT**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

---

IN RE LIBOR BASED FINANCIAL  
INSTRUMENTS ANTITRUST LITIGATION

: MDL No.: 2262  
: ECF CASE  
: Master File No. 1:11-md-2262-NRB

---

THIS DOCUMENT RELATES TO ALL  
ACTIONS.

---

### **ACKNOWLEDGMENT AND AGREEMENT TO BE BOUND BY STIPULATION AND ORDER OF CONFIDENTIALITY**

I, Stephen J. Greenfogel, counsel to plaintiff 33-35 Green Pond Road Associates, LLC, 33-35 Green Pond Associates, LLC v. Bank of America Corp., et al., Civil Action No. 12-cv-5822 (S.D.N.Y.)(NRB), under penalty of perjury, 28 U.S.C. §1746, declare as follows:

1. Information, including documents and things, designated as “CONFIDENTIAL” or “HIGHLY CONFIDENTIAL” as defined in the Stipulation and Order of Confidentiality entered in the above-captioned Actions (the “Stipulation and Order”), is being provided to me pursuant to the restrictions of the Stipulation and Order.
2. I have been given a copy of and have read the Stipulation and Order.
3. I am familiar with the terms of the Stipulation and Order, and I agree to comply with and to be bound by its terms.
4. I submit to the jurisdiction of the United States District Court for the Southern District of New York for enforcement of the Stipulation and Order.

5. I acknowledge that violation of the Stipulation and Order may result in penalties for contempt of court.

6. I agree to not use Confidential or Highly Confidential Discovery Materials disclosed to me pursuant to the Stipulation and Order except for purposes of the above-captioned litigation and not to disclose any of this information to persons other than those specifically authorized by the Stipulation and Order, without the express written consent of the party who designated the information as confidential or by order of the presiding judge.

7. I agree to notify any stenographic, clerical, or technical personnel who are required to assist me of the terms of this Stipulation and Order and of its binding effect on them to me.

Name: Stephen J. Greenfogel

Signature: 

Signed at Newark, New Jersey, this 22<sup>nd</sup> day of June, 2018

## ACKNOWLEDGEMENT

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

IN RE LIBOR-BASED FINANCIAL  
INSTRUMENTS ANTITRUST  
LITIGATION

THIS DOCUMENT RELATES TO ALL  
ACTIONS.

MDL No. 2262

ECF Case

Master File No. 1: 11-md-2262-NRB

### ACKNOWLEDGMENT AND AGREEMENT TO BE BOUND BY STIPULATION AND ORDER OF CONFIDENTIALITY

I, William H. London, counsel to plaintiff 33-35 Green Pond Road Associates, LLC, 33-35 *Green Pond Associates, LLC v. Bank of America Corp., et al.*, Civil Action No. 12-cv-5822 (S.D.N.Y.) (NRB), under penalty of perjury, 28 U.S.C. §1746, declare as follows:

1. Information, including documents and things, designated as "CONFIDENTIAL" or "HIGHLY CONFIDENTIAL" as defined in the Stipulation and Order of Confidentiality entered in the above-captioned Actions (the "Stipulation and Order"), is being provided to me pursuant to the restrictions of the Stipulation and Order.
2. I have been given a copy of and have read the Stipulation and Order.
3. I am familiar with the terms of the Stipulation and Order, and I agree to comply with and to be bound by its terms.
4. I submit to the jurisdiction of the United States District Court for the Southern District of New York for enforcement of the Stipulation and Order.
5. I acknowledge that violation of the Stipulation and Order may result in penalties for contempt of court.

6. I agree to not use any Confidential or Highly Confidential Discovery Materials disclosed to me pursuant to the Stipulation and Order except for purposes of the above-captioned litigation and not to disclose any of this information to persons other than those specifically authorized by the Stipulation and Order, without the express written consent of the party who designated the information as confidential or by order of the presiding judge.

7. I agree to notify any stenographic, clerical, or technical personnel who are required to assist me of the terms of this Stipulation and Order and of its binding effect on them and me.

Name: William H. London

Signature: William H. London

Signed at Bannockburn, Illinois, this 22nd day of June, 2018

## **ACKNOWLEDGMENT**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

---

IN RE LIBOR BASED FINANCIAL  
INSTRUMENTS ANTITRUST LITIGATION

: MDL No.: 2262

: ECF CASE

: Master File No. 1:11-md-2262-NRB

---

THIS DOCUMENT RELATES TO ALL  
ACTIONS.

---

### **ACKNOWLEDGMENT AND AGREEMENT TO BE BOUND BY STIPULATION AND ORDER OF CONFIDENTIALITY**

I, Joseph J. DePalma, counsel to plaintiff 33-35 Green Pond Road Associates, LLC, 33-35 Green Pond Associates, LLC v. Bank of America Corp., et al., Civil Action No. 12-cv-5822 (S.D.N.Y.)(NRB), under penalty of perjury, 28 U.S.C. §1746, declare as follows:

1. Information, including documents and things, designated as “CONFIDENTIAL” or “HIGHLY CONFIDENTIAL” as defined in the Stipulation and Order of Confidentiality entered in the above-captioned Actions (the “Stipulation and Order”), is being provided to me pursuant to the restrictions of the Stipulation and Order.
2. I have been given a copy of and have read the Stipulation and Order.
3. I am familiar with the terms of the Stipulation and Order, and I agree to comply with and to be bound by its terms.
4. I submit to the jurisdiction of the United States District Court for the Southern District of New York for enforcement of the Stipulation and Order.

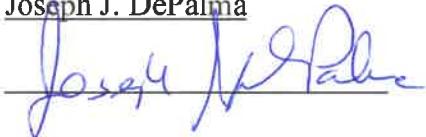
5. I acknowledge that violation of the Stipulation and Order may result in penalties for contempt of court.

6. I agree to not use Confidential or Highly Confidential Discovery Materials disclosed to me pursuant to the Stipulation and Order except for purposes of the above-captioned litigation and not to disclose any of this information to persons other than those specifically authorized by the Stipulation and Order, without the express written consent of the party who designated the information as confidential or by order of the presiding judge.

7. I agree to notify any stenographic, clerical, or technical personnel who are required to assist me of the terms of this Stipulation and Order and of its binding effect on them to me.

Name: Joseph J. DePalma

Signature:

A handwritten signature in blue ink that reads "Joseph J. DePalma". The signature is cursive and appears to be a digital scan of a physical signature.

Signed at Newark, New Jersey, this 22<sup>nd</sup> day of June, 2018